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July 15, 2005

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Director Pat Miller Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

Re:

BellSouth Tariff to Introduce Transit Traffic Service (No. 04-01259)

Docket No 04-00380

Dear Director Miller:

This letter is written on behalf of the Rural Independent Coalition pursuant to your July 11 request for a list of issues to be resolved in this proceeding and for a list of dates that counsel, witnesses and other necessary parties will be available for hearings in this matter.

The list of issues is attached hereto Our dates of availability are as follows: July: none, August 18-19; September 6-9. The month of October is free, except for the 12th, 13th and 28th.

Respectfully,

William T. Ramsey

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Attachment

Tennessee Rural Coalition's Initial Issue List Re BellSouth Transit Service Tariff - Docket No. 04-00380 Submitted July 15, 2005

Threshold Issues

- 1. Is BellSouth's Transit Service Tariff the appropriate mechanism to address the terms and conditions for transit service provided by BellSouth or should these terms be established by BellSouth through negotiation and interconnection agreements?
- 2. Under what provision, if any, is the billing of tariffed services such as Transit Service included under the Intralata toll settlement agreement?
- 3. What options are available to a Coalition member that chooses not to rely on BellSouth's Tariffed Transit Service? How do the Coalition members implement tandem office options other than dependence on BellSouth's Tariffed Transit Service?
- 4. What are the competitive implications of BellSouth occupying a central role between and among competitors in Tennessee, and how should those implications be addressed?

Administrative Issues

- 5. Is the Intralata toll settlement process, including potentially the "netting" of charges, appropriate for collecting transit fees, or should the billing of transit charges be accomplished through a separate invoice procedure?
- 6. What information and documentation should BellSouth be required to provide to Coalition members to whom BellSouth's transit service charge may be assessed?
- 7. How will the Coalition members audit any monthly billing imposed by BellSouth for Tariffed Transit Services? How can the Coalition members determine the accuracy of any BellSouth billing of Tariffed Transit Service?

Rate, Compensation, and Cost Recovery Issues

8. Assuming the existing BellSouth tariff is appropriate, how should the rate for transport and switching of transit traffic be determined and what should the rate be?

Tennessee Rural Coalition's Initial Issue List Re: BellSouth Transit Service Tariff - Docket No. 04-00380 Submitted July 15, 2005

- 9. Which carrier should be responsible for providing compensation to BellSouth for the provision of the transit and switching services?
- 10. What treatment should be afforded ISP-Bound traffic?
- 11. What treatment should be afforded county-wide and metro-area calling with respect to BellSouth Tariffed Transit Service?
- 12. If a Coalition member were to incur new expenses in the form of payment of transit charges to BellSouth, what should the cost recovery be for these expenses?

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2005 a copy of the foregoing document was served on the following as indicated:

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